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## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 7

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SILVIA YOVTCHEVA

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DEBTOR : BKY. NO. 17-17779-amc

## APPLICATION OF TRUSTEE FOR EMPLOYMENT OF COUNSEL

The Application of the Trustee, Terry P. Dershaw, Esquire, respectfully represents:

- 1. Applicant is the duly appointed and acting Trustee in this proceeding.
- 2. Applicant requires the employment of counsel to properly represent the Trustee and to assist in the recovery, collection and distribution of assets. The Trustee has been advised that the Debtor is the beneficiary to a life insurance policy, which may have value. Counsel is required to review and analyze this potential asset, which may create an Estate for creditors.
- 3. The Trustee has made a careful and diligent inquiry into the qualifications and competence of Fox Rothschild LLP and is advised that Fox Rothschild LLP, by reason of ability, integrity and professional experience, is capable of providing legal counsel to the Trustee. Said Fox Rothschild LLP has no interest adverse to the Estate or to Applicant.
- 4. To the best of Applicant's knowledge, Fox Rothschild LLP has no connection with the Debtor, creditors or any other parties in interest, their respective attorneys or accountants pursuant to Bankruptcy Rule 2014.

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5. Fox Rothschild LLP has represented numerous trustees in a variety of complex

matters and is experienced in matters of this type.

6. Applicant has engaged the services of Fox Rothschild LLP as counsel to the

Trustee, subject to Court approval.

7. Fox Rothschild LLP will render the following professional services:

a) to give the Trustee legal advice with respect to his powers and duties in this

Chapter 7 proceeding;

b) to prepare on behalf of your Applicant as Trustee the necessary applications,

answers, orders, reports and other legal papers; and

c) to perform all of the legal services for the Trustee which may be necessary

herein;

WHEREFORE, your Applicant prays for the appointment of Fox Rothschild LLP as

counsel to the Trustee, at such compensation as the Court allows.

/s/ Terry P. Dershaw

TERRY P. DERSHAW